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November 24, 2014

Donald Cabell
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William Weinreb
Assistant U.S. Attorneys
United States Courthouse
1 Courthouse Way, Suite 9200
Boston, Massachusetts 02210

Re: United States v. Dzhokhar Tsarnaev
Criminal No. 13-10200-GAO

Dear Counsel;

Pursuant to the Court's September 25, 2014 scheduling Order, we write to provide materials pursuant to Rule 16(b), including additional penalty phase expert disclosures. We also note that one or more of the experts noticed on October 2, 2014 may also be called during the penalty phase. This letter, the CV's and the other materials are on the enclosed password protected thumb drive. The password uses the same convention you have been using. We will email the index to you. The materials should be considered "sensitive" under the protective order.

Term	Percentage (%)
Climate change	98
Global warming	98
Green energy	98
Sustainable development	98
Environmental protection	98
Ecology	98

Term	Percentage (%)
international aid	~90
aid	~90
charity	100
non-governmental organization (NGO)	100
non-profit organization (NPO)	100
volunteer	100
fundraising	100
charitable organization	100
charitable cause	100
charitable donation	100
charitable contribution	100
charitable giving	100
charitable organization	100
charitable cause	100
charitable donation	100
charitable contribution	100
charitable giving	100

Term	Percentage
Climate change	100%
Global warming	98%
Green energy	95%
Sustainable development	92%
Environmental protection	88%

Term	Percentage (%)
Climate change	95
Global warming	92
Green energy	98
Sustainable development	95
Carbon footprint	88
Environmental protection	98
Recycling	95
Organic food	92

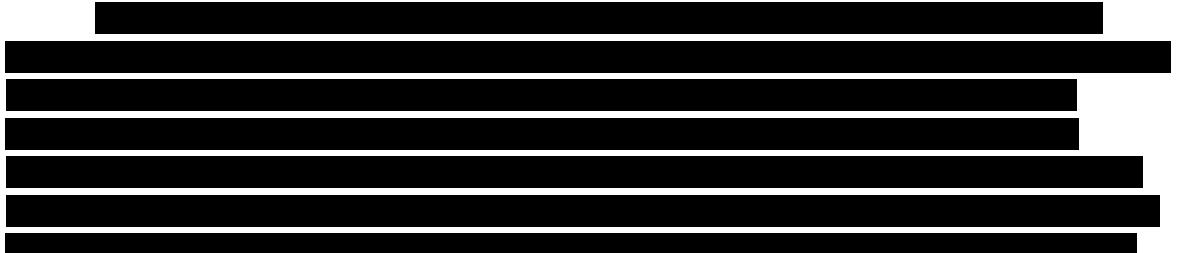
Term	Percentage
GMOs	~95%
Organic	~90%
Natural	~90%
Artificial	~85%
Organic	~80%
Natural	~80%
Artificial	~75%
Organic	~70%
Natural	~70%
Artificial	~65%

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Jay Giedd, MD. Dr. Giedd received his Medical Degree in 1986 from the University of North Dakota. He holds board certification from the American Board of Psychiatry and Neurology (1992), the American Academy of Child and Adolescent Psychiatry (1993), and in Geriatric Psychiatry from the American Board of Psychiatry and Neurology (1994). He was a postgraduate fellow in the Child and Adolescent Psychiatry Program at Duke University School of Medicine from 1989 to 1991, and then accepted a position as Clinical Staff Fellow at the Child Psychiatry Branch of the National Institute of Mental Health (NIMH). Dr. Giedd became the Chief of Brain Imaging with the Child Psychiatry Branch of the National Institute of Mental Health, as well as a practicing clinician. He is internationally recognized for his work in the area of adolescent maturation and brain development, and has published widely in the area of child and adolescent brain development. In 2000, he participated in White House Conference on Teenagers: Raising Responsible and Resourceful Youth. In 2013, the Brain and Behavior Research Foundation awarded him the Ruane Prize for Outstanding Child and Adolescent Psychiatric Research. He recently joined the faculty at the University of California San Diego where he serves as the Director of the Division of Child and Adolescent Psychiatry. His C.V. is enclosed.

Dr. Giedd will testify about contemporary brain research focused on the development and maturation of the human brain from birth to adulthood, with specific attention to the period of adolescence and early adulthood. He will discuss the underlying neurodevelopmental processes of human brain maturation and the cognitive and functional behaviors that mark different developmental periods, as well as discussing the neurobiological bases that explain the deficits in judgment and impulse-control that are hallmarks of adolescence. He will testify about scientific research findings that are beyond the knowledge of most jurors and assist the jurors in understanding that there is not a clear line between adolescence and adulthood, and that the normal maturation process is by no means completed at age 19 or 20. Adolescence is characterized by heightened emotional reactivity, sensitivity to peer influence, impulsivity, and novelty seeking, with a limited capacity to engage self-control to override these emotions and actions. These behavioral attributes are paralleled by hormonal and neurobiological changes that target specific brain regions and cell populations. He will identify factors that are used to determine where along the developmental trajectory of cognition and

emotional maturation an individual person is in comparison to age peers. This neurodevelopmental approach to cognitive functioning considers both normal, healthy development as well deviations from the expected developmental course. Dr. Giedd's testimony is expected to assist the jury in weighing the significance of the defendant's age on the question of his prospects for rehabilitation, or, as the Supreme Court framed the question, "his potential to attain a mature understanding of his own humanity." *Roper v. Simmons*, 543 US 551, 574 (2005).



Term	Percentage (%)
Climate change	98
Global warming	98
Green energy	95
Sustainable development	98
Environmental protection	98
Recycling	98
Organic food	95

Sincerely,

/s/

David I. Bruck
Judy Clarke
Miriam Conrad
William Fick
Timothy Watkins

Counsel for Dzhokhar Tsarnaev

enclosures